



**GEORGIA GOVERNMENT TRANSPARENCY &
CAMPAIGN FINANCE COMMISSION**

Memorandum

TO: David Emadi
Executive Secretary

FROM: Joe Cusack
Senior Staff Attorney

DATE: May 4, 2021

RE: RECOMMENDATION FOR ADMINISTRATIVE DISMISSAL
In the Matter of Buddy "Neil" Warren
Case Number: 20-0085-C

On October 19, 2020 the Georgia Government Transparency and Campaign Finance Commission ("Commission") received a third-party complaint filed by James Herndon ("Complainant") alleging that Buddy "Neil" Warren ("Respondent") had violated the Campaign Finance Act ("Act") by receiving an agency contribution in violation of O.C.G.A. § 21-5-30.2, violated the Cobb County civic service act and policy on political activities, failed to disclose property he had an ownership interest on his Personal Financial Disclosure Statement, and failed to properly abide by the terms of a consent agreement he entered into with Campaign Finance Commission Staff in Case 2019-0024PC.

Respondent was the unsuccessful candidate in the Cobb County Sheriff's Election which was held on November 3, 2020. Respondent had previously held the post of Sheriff from 2003 until this past election cycle.

This Complaint came on the heels of Commission Staff conducting an extensive investigation into Respondent's campaign and resulted in Respondent's campaign admitting they had violated the Act in multiple fashions. In reviewing this Complaint, which was received after the consent agreement was accepted by the Commission, and the accompanying evidence, there does not appear to be an agency contribution or violation of O.C.G.A. § 21-5-30.2. The accompanying evidence appears to show employees of the Cobb County Sheriff's Office working on Respondent's campaign in their personal time, which is permissible. One piece of evidence even shows an individual working in their personal workshop in plain clothes. Based upon the evidence provided and knowledge gained through a previous investigation there does not appear to be any agency contribution in violation of O.C.G.A. § 21-5-30.2.



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As to the violations alleged which relate to the Cobb County civic service act and policy on political activities, these fall outside the jurisdiction of the Commission and thus are not considered nor investigated.

Complainant alleges that Respondent did not fully disclose property interests on his Personal Financial Disclosure Statement. From a review of the relevant documents, exhibits, and filings it appears that Respondent was substantially compliant in the filing of his Personal Financial Disclosure Statement and he accurately disclosed the required information.

Complainant further alleges that Respondent failed to abide by the terms of a consent agreement he entered into with the Commission on Case 2019-0024PC. Respondent paid the final balance of his civil penalty in Case 2019-0024PC on November 3, 2020 and thus fulfilled his obligations in relation to the consent agreement entered in that case. Upon review, it does not appear that Respondent violated any portion of that consent agreement and he abided by the terms set forth in the agreement.

Since no violations of the Act occurred, there is no basis to basis to proceed. Based upon the forgoing analysis, this complaint should be administratively dismissed pursuant to Ga. Comp. R. & Regs. 189-2-.03(5).

I, David Emadi Executive Secretary of the Georgia Government Transparency and Campaign Finance Commission, agree with the above analysis to administratively dismiss this complaint. Thus, the above-referenced complaint shall stand dismissed.



David Emadi, Executive Secretary



Date